

May 5, 2024

Dear Idaho Department of Water Resources and the Big Wood GWMA Advisory Committee,

Thank you for continuing to involve the local environmental NGOs in updates to the Big Wood GWMA Management Plan. At the April 17th Advisory Committee meeting, the Advisory Committee requested that the NGOs provide a more specific request for updates to the Management Plan. Our intention is to provide more specifics in this letter.

Section IV. Management Plan Goals

Our letter dated March 8, 2024 requested that the Management Plan include a goal supporting sufficient instream or natural stream flows in the Big Wood River, Little Wood River, and Silver Creek to sustain recreational and agricultural based economies, communities, thriving fisheries, and the overall health of the Wood River watershed's ecosystems. The Advisory Committee requested that we provide a specific request, as the goal stated in the Plan establishes a 32 cfs four-day moving average streamflow target from May 1 through September 30 at Station 10, Little Wood River near Richfield.

During the drafting of the original Management Plan, we provided comments supporting the creation of additional target flows within the Big Wood, Little Wood, and Silver Creek system that would meet both agricultural water needs and environmental flows. This concept of target flows has been previously discussed, in concept, at meetings of the Wood River Water Collaborative. The Wood River Water Collaborative includes over 65 water users and interested parties, including members of the Advisory Committee, staff from IDWR, and representatives from local surface and groundwater districts. We request that the following target flows be considered as additional goals in the Management Plan, to provide flows for aquatic health and agriculture. We recommend similar four-day moving average streamflow targets from May 1 through September 30.

USGS Hailey Gauge: 160 cfs

Cumulative flows into Magic Reservoir (USGS Stanton gauge, USGS Camas Creek gauge, and SPF Engineering Willow Creek gauge): 80 cfs

Big Wood River below Magic Reservoir: 5 cfs

Sportsman's gauge: 90 cfs

Dietrich Bypass: 35 cfs

Station 54: 25 cfs

Appendix A to BWRGWMA Advisory Committee Groundwater Management Plan Term Sheet (Cities/SVWSD/SVC Term Sheet Re: Big Wood River GWMA Management Plan)

Per the Cities/SVWSD/SVC Term Sheet (Appendix A), the Cities, SVWSD, and SVC were directed to '...schedule a meeting with local environmental groups within 60 days of a full GWMA Plan being

approved by the Director to investigate potential additional water conservation measures that could be implemented.’ That meeting took place on April 13, 2023 and included representatives from Wood River Land Trust, Trout Unlimited, The Nature Conservancy, SVC, SVWSD, the Cities as represented by the City of Hailey, Idaho Dept. of Water Resources, and representatives from BWLWWUA.

As a result of that meeting, we are wondering if the following could be included in the Management Plan:

1. Adoption of Wood River Valley Water Conservation Guidelines: in 2018, Wood River Land Trust worked with a group of representatives from Blaine County, City of Bellevue, the City of Hailey, the City of Ketchum, the City of Sun Valley, industry representatives, local non-profits, and citizens from the community to produce a list of best practices and guidelines for establishing and maintaining landscaping while conserving water resources. We recommend the adoption of these practices and guidelines for all new developments within the Wood River Valley. We further recommend that each jurisdiction enforce its own standards for residential and municipal irrigation, including days of the week and times of day.
2. All landscaping irrigation would be limited to dates consistent with those of groundwater users, per the GWMA term sheet (May 1 - Sept. 15) and residential irrigation standards (i.e. watering on specific dates and times) would be enforced through fines or other methods.
3. Reductions in demand and consumptive use on parks, open space parcels, and golf courses within the Cities, SVCo, and SVWSD, and irrigated areas owned or managed by the Cities, SVCo, SVWSD, and the Blaine County School District.
4. All new and replacement municipal wastewater and subdivision irrigation systems would utilize graywater for landscaping irrigation.

Thank you for providing the opportunity to participate with updates to the Management Plan. We hope the Department and Advisory Committee will consider the above questions and recommendations.

Sincerely,

Wood River Land Trust, Silver Creek Alliance, Trout Unlimited, and The Nature Conservancy